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Attorneys for Plaintiff DIRUL ROBINSON

## UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

DIRUL ROBINSON, an individual;

Plaintiff,

v.

CITY OF TORRANCE; TORRANCE  
POLICE DEPARTMENT; TORRANCE  
POLICE DEPARTMENT OFFICER  
SATTEFIELD; TORRANCE POLICE  
DEPARTMENT OFFICER YOUNG;  
TORRANCE POLICE DEPARTMENT  
OFFICER WALLACE; TORRANCE  
POLICE DEPARTMENT OFFICER  
TOMISIC; DOE POLICE OFFICERS 1–  
20, inclusive; and DOE  
CORRECTIONAL OFFICERS 1–20,  
inclusive;

Defendants.

Case No.: 2:22-cv-05173-RGK-E

*Assigned to the Hon. R. Gary Klausner*

### **PLAINTIFF'S PROPOSED SPECIAL VERDICT FORM**

Pre-Trial Conference: June 5, 2023

Trial Date: June 13, 2023

1 We, the jury, unanimously find the following verdict on the questions submitted  
2 to us based on the preponderance of the evidence:

3  
4 **SECTION 1: DEFENDANT CHRISTOPHER ALLEN-YOUNG**

5  
6 **Claim 1: Excessive Force**

7  
8 1. Did Defendant Christopher Allen-Young intentionally detain Plaintiff  
9 Dirul Robinson?

10 ☐ Yes

☐ No

11  
12 *If your answer to question 1 is yes, then answer question 2. If you answered no,*  
13 *stop here and answer question 6 below, under Claim 2 “Unlawful Seizure and*  
14 *Detention.”*

15  
16 2. Was Defendant Christopher Allen-Young acting or purporting to act in the  
17 performance of his official duties as a police officer when he detained Plaintiff Dirul  
18 Robinson?

19 ☐ Yes

☐ No

20  
21 *If your answer to question 2 is yes, then answer question 3. If you answered no,*  
22 *stop here and answer question 6 below, under Claim 2 “Unlawful Seizure and*  
23 *Detention.”*

3. Did Defendant Christopher Allen-Young use excessive force in detaining Plaintiff Dirul Robinson?

☐ Yes

☐ No

*If your answer to question 3 is yes, then answer question 4. If you answered no, stop here and answer question 6 below, under Claim 2 “Unlawful Seizure and Detention.”*

4. Did Defendant Christopher Allen-Young’s use of excessive force against Plaintiff Dirul Robinson cause harm to Mr. Robinson?

☐ Yes

☐ No

*If your answer to question 4 is yes, then answer question 5. If you answered no, stop here and answer question 6 below, under Claim 2 “Unlawful Seizure and Detention.”*

5. Do you find that Defendant Christopher Allen-Young’s excessive force against Plaintiff Dirul Robinson was malicious, oppressive, or in reckless disregard of Mr. Robinson’s rights?

☐ Yes

☐ No

*After answering either “yes” or “no” to question 5, please answer question 6 below, under Claim 2 “Unlawful Seizure and Detention.”*

**Claim 2: Unlawful Seizure and Detention**

6. Was Plaintiff Dirul Robinson intentionally seized and detained by officers acting under color of law?

☐ Yes

☐ No

*If your answer to question 6 is yes, then answer question 7. If you answered no, stop here and answer question 12 below, under Section 2 “DEFENDANT JOSHUA SATTERFIELD.”*

7. Was Defendant Christopher Allen-Young an integral participant in the seizure and detention of Plaintiff Dirul Robinson?

☐ Yes

☐ No

*If your answer to question 7 is yes, then answer question 8. If you answered no, stop here and answer question 12 below, under Section 2 “DEFENDANT JOSHUA SATTERFIELD.”*

8. Did Defendant Christopher Allen-Young know, or reasonably should have known, that his participation in the seizure and detention of Plaintiff Dirul Robinson would cause a deprivation of Mr. Robinson’s rights?

☐ Yes

☐ No

*If your answer to question 8 is yes, then answer question 9. If you answered no, stop here and answer question 12 below, under Section 2 “DEFENDANT JOSHUA SATTERFIELD.”*

1           9.     Was the seizure and detention of Plaintiff Dirul Robinson unreasonable?

2                   ☐ Yes

☐ No

3  
4           *If your answer to question 9 is yes, then answer question 10. If you answered no,*  
5           *stop here and answer question 12 below, under Section 2 “DEFENDANT*  
6           *JOSHUA SATTERFIELD.”*

7  
8           10.    Did Defendant Christopher Allen-Young’s participation in the seizure and  
9           detention of Plaintiff Dirul Robinson cause harm to Mr. Robinson?

10                   ☐ Yes

☐ No

11  
12           *If your answer to question 10 is yes, then answer question 11. If you answered*  
13           *no, stop here and answer question 12 below, under Section 2 “DEFENDANT*  
14           *JOSHUA SATTERFIELD.”*

15  
16           11.    Do you find that Defendant Christopher Allen-Young’s participation in the  
17           seizure and detention of Plaintiff Dirul Robinson was malicious, oppressive, or in  
18           reckless disregard of Mr. Robinson’s rights?

19                   ☐ Yes

☐ No

20  
21           *After answering either “yes” or “no” to question 11, please answer question 12*  
22           *below, under Section 2 “DEFENDANT JOSHUA SATTERFIELD.”*  
23  
24  
25  
26  
27  
28

**SECTION 2: DEFENDANT JOSHUA SATTERFIELD**

**Claim 1: Excessive Force**

12. Did Defendant Joshua Satterfield intentionally detain Plaintiff Dirul Robinson?

☐ Yes

☐ No

*If your answer to question 12 is yes, then answer question 13. If you answered no, stop here and answer question 17 below, under Claim 2 “Unlawful Seizure and Detention.”*

13. Was Defendant Joshua Satterfield acting or purporting to act in the performance of his official duties as a police officer when he detained Plaintiff Dirul Robinson?

☐ Yes

☐ No

*If your answer to question 13 is yes, then answer question 14. If you answered no, stop here and answer question 17 below, under Claim 2 “Unlawful Seizure and Detention.”*

14. Did Defendant Joshua Satterfield use excessive force in detaining Plaintiff Dirul Robinson?

☐ Yes

☐ No

*If your answer to question 14 is yes, then answer question 15. If you answered no, stop here and answer question 17 below, under Claim 2 “Unlawful Seizure and Detention.”*

15. Did Defendant Joshua Satterfield's use of excessive force against Plaintiff Dirul Robinson cause harm to Mr. Robinson?

☐ Yes ☐ No

*If your answer to question 15 is yes, then answer question 16. If you answered no, stop here and answer question 17 below, under Claim 2 “Unlawful Seizure and Detention.”*

16. Do you find that Defendant Joshua Satterfield's excessive force against Plaintiff Dirul Robinson was malicious, oppressive, or in reckless disregard of Mr. Robinson's rights?

☐ Yes ☐ No

*After answering either “yes” or “no” to question 16, please answer question 17 below, under Claim 2 “Unlawful Seizure and Detention.”*

### **Claim 2: Unlawful Seizure and Detention**

17. Was Plaintiff Dirul Robinson intentionally seized and detained by officers acting under color of law?

☐ Yes ☐ No

*If your answer to question 17 is yes, then answer question 18. If you answered no, stop here and answer question 23 below, under Section 3 “DAMAGES.”*

1 18. Was Defendant Joshua Satterfield an integral participant in the seizure and  
2 detention of Plaintiff Dirul Robinson?

3 ☐ Yes

☐ No

4  
5 *If your answer to question 18 is yes, then answer question 19. If you answered*  
6 *no, stop here and answer question 23 below, under Section 3 “DAMAGES.”*  
7

8 19. Did Defendant Joshua Satterfield know, or reasonably should have known,  
9 that his participation in the seizure and detention of Plaintiff Dirul Robinson would  
10 cause a deprivation of Mr. Robinson’s rights?

11 ☐ Yes

☐ No

12  
13 *If your answer to question 19 is yes, then answer question 20. If you answered*  
14 *no, stop here and answer question 23 below, under Section 3 “DAMAGES.”*  
15

16 20. Was the seizure and detention of Plaintiff Dirul Robinson unreasonable?

17 ☐ Yes

☐ No

18  
19 *If your answer to question 20 is yes, then answer question 21. If you answered*  
20 *no, stop here and answer question 23 below, under Section 3 “DAMAGES.”*  
21

22 21. Did Defendant Joshua Satterfield’s participation in the seizure and  
23 detention of Plaintiff Dirul Robinson cause harm to Mr. Robinson?

24 ☐ Yes

☐ No

25  
26 *If your answer to question 21 is yes, then answer question 22. If you answered*  
27 *no, stop here and answer question 23 below, under Section 3 “DAMAGES.”*  
28



22. Do you find that Defendant Joshua Satterfield's participation in the seizure and detention of Plaintiff Dirul Robinson was malicious, oppressive, or in reckless disregard of Mr. Robinson's rights?

☐ No

**SECTION 3: DAMAGES**

**Defendant Christopher Allen-Young**

23. As a result of Defendant Christopher Allen-Young's conduct, what is the amount of damages to which Plaintiff Dirul Robinson is entitled for each of the following categories?

- Past economic loss, including lost earnings: \$ \_\_\_\_\_
- Future economic loss, including lost earnings: \$ \_\_\_\_\_
- Past non-economic loss, including emotional distress: \$ \_\_\_\_\_
- Future non-economic loss, including emotional distress: \$ \_\_\_\_\_
- Punitive damages: \$ \_\_\_\_\_

TOTAL: \$ \_\_\_\_\_

*Please answer question 24 on the next page.*

**Defendant Joshua Satterfield**

24. As a result of Defendant Joshua Satterfield's conduct, what is the amount of damages to which Plaintiff Dirul Robinson is entitled for each of the following categories?

- Past economic loss, including lost earnings: \$ \_\_\_\_\_
- Future economic loss, including lost earnings: \$ \_\_\_\_\_
- Past non-economic loss, including emotional distress: \$ \_\_\_\_\_
- Future non-economic loss, including emotional distress: \$ \_\_\_\_\_
- Punitive damages: \$ \_\_\_\_\_

TOTAL: \$ \_\_\_\_\_

*STOP. There are no more questions to answer. Please instruct the foreperson to sign and date this verdict form below.*

Dated: \_\_\_\_\_

JURY FOREPERSON